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12 *Attorneys for Non-Party Respondents*
 13 *Artis Capital Management, L.P., Sequoia*
Capital Operations LLC and
TriplePoint Capital LLC

12 *Attorneys for Premier League Plaintiffs,*
Petitioners

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 SAN FRANCISCO DIVISION

18 VIACOM INTERNATIONAL INC., ET AL.) CASE NO.: 3:08-MC-80129-SI
 19 Plaintiffs,) [Case No. 07-cv-02103 (LLS) in the
 20 v.) U.S. D.C., S.D.N.Y]
 21 YOUTUBE, INC., ET AL.) **[PROPOSED] ORDER AND**
 22 Defendants.) **STIPULATION FOR AN**
EXTENSION OF TIME TO
PRODUCE DOCUMENTS

23 THE FOOTBALL ASSOCIATION PREMIER)
 24 LEAGUE LIMITED, ET AL.,)
 25 Plaintiffs,)
 26 v.)
 27 YOUTUBE, INC., ET AL.)
 28 Defendants.)

1 WHEREAS on August 18, 2008, in response to the Motion to Compel Production of
2 Documents Pursuant to Subpoenas filed by Viacom International Inc. et al., and The Football
3 Association Premier League Limited, et al. ("Plaintiffs"), this Court ordered Artis Capital
4 Management L.P., Sequoia Capital Operations LLC, and TriplePoint Capital LLC
5 ("Respondents") to produce certain documents ("Ordered Documents") by October 2, 2008
6 "unless [P]laintiffs and [R]espondents agree to a different deadline";

7 WHEREAS the volume of data Respondents have been obligated to restore from back-up
8 tapes and review in connection with the production of Ordered Documents makes meeting the
9 Court-ordered deadline of October 2, 2008 impracticable;

10 WHEREAS Respondents need to and through October 27, 2008 to finalize their review
11 and preparation of the Ordered Documents for production;

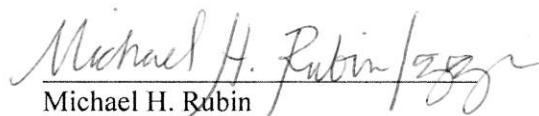
12 WHEREAS Respondents have agreed to produce documents responsive to all of the
13 requests as to which Plaintiffs and Respondents had previously reached agreement, up to
14 November 13, 2006 ("Agreed Upon Documents") by not later than September 26, 2008;

15 WHEREAS Respondents will use best efforts to produce a complete privilege log
16 contemporaneously with production of the Ordered Documents, or as shortly thereafter as
17 possible;

18 THEREFORE: The parties stipulate that (1) the deadline for Respondents' production of
19 Agreed Upon Documents shall be September 26, 2008; and (2) the deadline for Respondents'
20 production of the Ordered Document shall be moved from October 2, 2008 to October 27, 2008.

21 IT IS SO STIPULATED.

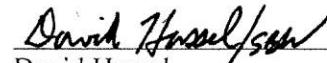
22 Date: Sept. 19, 2008


Michael H. Rubin
Attorneys for Non-Parties

24 Date: SEPT. 19, 2008


Stephen Hibbard
Attorneys for Viacom Plaintiffs

27 Date: SEPT. 19, 2008


David Hassel
Attorneys for Premier League Plaintiffs

1 [PROPOSED] ORDER

2 Good cause appearing, IT IS HEREBY ORDERED that (1) the deadline for
3 Respondents' production of Agreed Upon Documents shall be September 26, 2008; and (2) the
4 deadline for Respondents' production of Ordered Documents shall be moved from October 2,
5 2008 to October 27, 2008.

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7 SO ORDERED.



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Judge Susan Illston